

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

D.V.D., et al.,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND  
SECURITY, et al.,

Defendants.

Case No. 1:25-cv-10676-BEM

**PRESS MOVANTS' MOTION TO INTERVENE AND UNSEAL COURT RECORDS**

Pursuant to Federal Rule of Civil Procedure 24(b) and Local Rule 7.1, Proposed Intervenor The New York Times Company, American Broadcasting Companies, Inc. d/b/a ABC News, Cable News Network, Inc., Dow Jones & Company, Inc., publisher of The Wall Street Journal, National Public Radio, Inc., Reuters News & Media Inc., and WP Company LLC d/b/a The Washington Post (together, the "Press Movants") hereby move to intervene in this matter for the limited purpose of seeking access to certain court records that have been sealed in this action. The Press Movants respectfully request that the Court unseal ECF Nos. 131-1 and 145, and that, if the parties file additional records or seek to hold additional proceedings under seal in this matter, the Court provide reasonable notice, an opportunity to object, and on-the-record findings to support the granting of any such sealing request. The grounds for this motion are set forth in the accompanying memorandum of law. A proposed order is also attached.

Dated: June 13, 2025

Respectfully submitted,

BALLARD SPAHR LLP

/s/ Christopher A. Hatfield

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*Counsel for the Press Movants*

**LOCAL RULE 7.1(a)(2) CERTIFICATION**

I, Christopher A. Hatfield, counsel for the Press Movants in the above-captioned matter, hereby certify that, pursuant to Rule 7.1(a)(2) of the Local Rules for the United States District Court for the District of Massachusetts, on June 11, 2025, I contacted counsel for Plaintiffs and Defendants to meet and confer regarding this Motion and received no response from either party.

DATED: June 13, 2025

/s/ Christopher A. Hatfield

Christopher A. Hatfield (BBO #688386)

**CERTIFICATE OF SERVICE**

I hereby certify that on this 13th day of June, 2025, I caused a true and correct copy of the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will serve all parties of record in the case.

/s/ Christopher A. Hatfield

Christopher A. Hatfield